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Remarks

Applicants respectfully request reconsideration of this application as amended.

Claims 1, 4, 9, 11, 18 and 21 have been amended. Claims 3, 10 and 20 have been cancelled.

Therefore, claims 1, 2, 4-9, 11-19 and 21-24 are presented for examination.

Claims 18-24 stand rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Applicants submit that the claim 18 has been amended to appear in proper condition for allowance

Claims 6-8 stand rejected under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicants submit that the claims have been amended to appear in proper condition for allowance.

Applicants acknowledge that claims 6-8, 23 and 24 would be allowable if rewritten to include the limitations of the base claims and any intervening claims.

Claims 1, 2, 4, 9, 11-16, 18-19, and 21 stand rejected under 35 U.S.C. § 102(e) by Aleksic et al. (U.S. Patent No. 6,957,329). Applicants submit that the present claims are patentable over Aleksic.

Aleksic discloses methods and systems for encrypting data from a plurality of multimedia devices. A driver initiates authentication for the plurality of multimedia applications. The driver assigns a key registers to each of the applications, based on available key registers. The applications use generated encryption key values to send data to be decrypted by their assigned key registers. The driver notifies video processing hardware of encryption seed keys to determine the generated encryption key values and hardware stores the value of corresponding decryption keys the assigned key registers. Each register

can be used to exclusively decrypt data from an application of the plurality of applications. The driver directs the encrypted data from the applications to the video processing hardware. The video processing hardware decrypts the data and processes it into image data accordingly. See Aleksic at Abstract.

Claim 1 of the present application recites verifying at a first security module a digital signature of a device driver. Applicants submit that Aleksic does not disclose or suggest such a feature. In fact the Office Action admits that Aleksic does not disclose verifying at a first security module a digital signature of a device driver. See Office Action at page 10, first full paragraph. Thus, claim 1 is patentable over Aleksic.

Claims 2 and 4-8 depend from claim 1 and include additional features. Therefore, claims 2 and 4-8 are also patentable over Aleksic.

Independent claims 9 and 18 also include a feature of a first security module verifying a digital signature of a device driver. Thus, claims 8 and 18, and their respective dependent claims, are patentable over Aleksic for the reasons discussed above with respect to claim 1.

Claims 3, 10, and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Aleksic in view of Zimmer (U.S. Patent No. 6,978,018). Applicants submit that the above rejection has been obviated by the cancellation of claims 3, 10, and 20.

Further, applicants submit that Zimmer may not be considered as prior art precluding patentability of the present application. Section 103(c) states that:

Subject matter developed by another person, which qualifies as prior art only under one or more of the subsections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the invention was made, owned by

the same person or subject to an obligation of assignment to the same person.

Zimmer is considered prior art under 35 U.S.C. §102(e) because it was filed prior to the filing of the present application, but was first published 05-22-2003 after the filing of the present application (effective filing date: 02-20-2002). Additionally, at the time of conception of the present application, the Zimmer reference and the present application were both subject to an obligation of assignment to Intel Corporation. Therefore, due to the §102(e) status, and in light of §103(c), Zimmer cannot be used as a reference to preclude the patentability of the claims under 35 U.S.C §103. Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. §103 in view of Aleksic and Zimmer since Aleksic alone does not preclude the patentability of the claims.

Claims 5 and 22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Aleksic in view of Wyland (U.S. Pub. No. 2003/0065863). Applicants submit that the present claims are patentable over Aleksic in view of Wyland.

Wyland discloses a reprogrammable I/O system for a chip or board system that can be reprogrammed to simulate many I/O interfaces in firmware. The reprogrammable I/O system comprises an I/O cluster, an I/O bus, I/O pins, and logic at the I/O pins. The I/O pins are arranged logically in a row and are grouped into pin groups of eight pins. Each pin group also includes a pin state machine (PSM) and a data FIFO coupled together. Each PSM has chain connections to the two neighboring PSM's. Each data FIFO has chain connections to the two neighbor data FIFO's. The reprogrammable I/O system allows firmware to organize the I/O pins into I/O interfaces. The firmware in PSM's and the I/O cluster that control the operations of the I/O pins can be changed (reprogrammed) so that the I/O system can perform other different interfaces. See Wyman at Abstract.

Nonetheless, Wyland does not disclose or suggest verifying at a first security module a digital signature of a device driver. As discussed above, Aleksic does not disclose or suggest verifying at a first security module a digital signature of a device driver. Therefore, any combination of Aleksic and Wyland would not disclose or suggest such a feature. As a result, the present claims are patentable over Aleksic in view of Wyland.

Claim 17 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Aleksic in view of Farber et al. (U.S. Patent No. 6,920,221). Applicants submit that the present claims are patentable over Aleksic in view of Farber.

Farber discloses a video source application in a video source device that requests from a video hardware interface of the video source device status with respect to a link linking the video source device to an external video sink device, and supplements the status request with a first basis value to a symmetric ciphering/deciphering process. See Farber at Abstract.

However, Farber does not disclose or suggest verifying at a first security module a digital signature of a device driver. As discussed above, Aleksic does not disclose or suggest verifying at a first security module a digital signature of a device driver. Therefore, any combination of Aleksic and Farber would not disclose or suggest such a feature. As a result, the present claims are patentable over Aleksic in view of Farber.

Applicants respectfully submit that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.


The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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